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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COUNTRY MUTUAL INSURANCE
COMPANY as successor to HOLYOKE
MUTUAL INSURANCE COMPANY a/s/o
LAKERIDGE VILLAS HOMEOWNERS
ASSOCIATION,

Plaintiff,

vs.

TYANNE ELLIS-GUN,

Defendant.

Case Number:
3:19-cv-00463-LRH-WGC

**STIPULATION AND ORDER TO
AMEND COMPLAINT**

Counsel for Plaintiff, Country Mutual Insurance Company, and Counsel for Defendant,
Tyanne Ellis- Gunn, hereby stipulate to agree to Plaintiff filing the attached Amended Complaint

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1 in the above captioned matter. The Amended Complaint is intended to address a typographical
2 error in the original Complaint related to the Plaintiff's address.

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Dated this 14th day of July, 2020

Dated this 14th day of July, 2020

MARQUIS AURBACH COFFING

**THORNDAL ARMSTRONG DELK
BALKENBUSH & EISINGER**

By: /s/ Ben Wharton/Tye S. Hanseen

By: /s/ Michael C. Winn

Tye S. Hanseen, Esq.
Nevada Bar No. 10365
10001 Park Run Drive
Las Vegas, Nevada 89145
Local Counsel for Plaintiff

Michael C. Winn, Esq.
Nevada Bar No. 12664
6590 S. McCarran Blvd., Suite B
Reno, Nevada 89509
Attorneys for Defendant

Benjamin D. Wharton, Esq.
de Luca Levine, LLC
Three Valley Square, Suite 220
Blue Bell, PA 19422
Attorney for Plaintiff – pro hac vice

ORDER

IT IS SO ORDERED:

DATED this 15th day of July, 2020.



LARRY R. HICKS
UNITED STATES DISTRICT JUDGE

MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO AMEND COMPLAINT** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 14th day of July, 2020.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Rosie Wesp
an employee of Marquis Aurbach Coffing

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Exhibit 1

Proposed Amended Complaint

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 **Marquis Aurbach Coffing**
Tye S. Hanseen, Esq.
2 Nevada Bar No. 10365
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5 *Local counsel for Plaintiff*

6 de Luca Levine.
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7 Three Valley Square
Suite 220
8 Blue Bell, Pennsylvania 19422
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9 Facsimile: (215) 383-0082
ddeluca@delucalevine.com
10 *Attorney for Plaintiff*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 COUNTRY MUTUAL INSURANCE
COMPANY as successor to HOLYOKE
14 MUTUAL INSURANCE COMPANY a/s/o
15 LAKERIDGE VILLAS HOMEOWNERS
ASSOCIATION,

16 Plaintiff,

17 vs.

18 TYANNE ELLIS-GUN,

19 Defendant.

Case Number:

3:19-cv-00463-LRH-WGC

AMEND COMPLAINT

20
21 Plaintiff, Country Mutual Insurance Company as successor to Holyoke Mutual Insurance
22 Company as subrogee of Lakeridge Villas Homeowners Association (hereinafter "Plaintiff"), by
23 and through undersigned counsel, hereby demands judgment against Defendant, Tyanne Ellis-
24 Gun (hereinafter "Defendant"), and by way of Complaint against her avers as follows:

25 **PARTIES**

26 1. Plaintiff is a corporation incorporated in State of Illinois, having its principal
27 place of business at 1701 Towanda Avenue, Bloomington, Illinois.
28

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **AMENDED COMPLAINT** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the _____ day of July, 2020.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

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N/A

an employee of Marquis Aurbach Coffing